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Solutia Inc.
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August 6, 2001
(Via certified or express mail)

Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

Thomas Martin
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action**
• **# 3 - August 2001 Monthly Report**

Dear Mr. Turner and Mr. Martin,

Enclosed is the July 2001 Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") sediment removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting.

Sincerely,

D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc:

Michael Ribordy - USEPA Region 5
Mike McAteer - USEPA Region 5
S. Bron - IEPA
Mayor D. Reed - Cahokia
Mayor P. Sauget - Sauget, IL
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)
Rich Bartelt - Arcadis

Sauget File - Solutia
Mike Henry - IDNR
Kevin de la Bruere - USF&G
Jon Dikinas - Dikinas Consulting

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Monthly Report

Date of Report: August 6, 2001
Period Covered: July 1, 2001 – July 31, 2001
Next Report Period: August 1, 2001 – August 31, 2001

Background

A Unilateral Administrative Order (“UAO”) was issued to Solutia by the U. S. EPA on May 31, 2000, requiring construction of an on-site containment cell, removal of affected creek bed sediments and soils and flood plain soils from specific sections of Dead Creek, and placement of the affected sediments and soils in the newly constructed on-site cell. A Time Critical Removal Action Work Plan (“TCRAWP”) was initially submitted to the Agencies June 30, 2000 for review and approval. Agreements sufficient to proceed with issuance of a request for bids for the containment cell construction were reached in December, 2000. Bids were received in late January and evaluated in February 2001.

Fieldwork began on the sediment de-watering phase of the project in November 2000. Installation of the required facilities (piping, pumps, basins, etc.) to de-water the sediments while the containment cell is being constructed was completed and started up in February, 2001. Operation of these facilities will continue until all sediments are placed into the containment cell.

Subject to the inclusion of all comments and agreed upon revisions, approval of the containment cell design by U. S. EPA was received March 5, 2001. A contract for construction of the containment cell was awarded March 8, 2001 to LMS Environmental Contracting, Inc. (“LMS”).

A revised draft containment cell design was submitted to the Agencies March 30, 2001. This revised draft containment cell design incorporated all Agencies’ comments and changes agreed to during the preceding discussion period. Placement of fill for the Containment Cell berms began April 23, 2001. The March 30, 2001 revised draft containment cell design (as further revised) was approved by the Agencies in a May 10, 2001 letter. Solutia agreed to continue to address remaining issues in good faith. On May 29, 2001, Solutia received from Kevin Turner IEPA’s comments on the Sauget Area I TSCA Containment Cell Design.

Agency Actions / Communications

- NONE

Work Performed during the reporting period

- On July 9, 2001, Solutia submitted its Response to the Agencies' May 29, 2001 Comments on the Sauget Area I TSCA Containment Cell Design. These Comments remained to be addressed after the Cell design was approved by the Agencies on May 10, 2001.
- A project award was made 08/01/01 to URS to install groundwater monitoring wells as approved under the Groundwater Monitoring Program for the Sediment Containment Cell UAO.
- Maintained dewatering pumps and continued sediment dewatering activities over the entire creek
- Continued dewatering and completed sediment removal from Site M.
 - Completed berm stabilization as required.
 - Restored disturbed areas in Site M.
- Began construction of the Containment Cell stormwater treatment pad for the treatment tanks.
- Continued construction of the Containment Cell
 - LMS continued hauling and placing soil to construct the cell berms.
 - LMS began and completed construction of the capillary break zone.
 - LMS completed construction of the first geotextile layer of the capillary zone and the 6" layer of compacted fill above the first geotextile layer.

Data Submittal

- There is no new data to submit
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Work scheduled for next reporting period

- Complete installation and sampling of groundwater monitoring wells.
- Complete sediment removal from Parks College south to Old Route 3.
- Continue installation of the cell liner system.
- Complete archeological investigation in Segment B.
- Begin hauling stockpiled sediments from Segments C, D, and E to Segment B for screening. Begin screening.

PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	0 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Creek Sediment Excavation	7 %
Cover Installation	0 %
Demobilization	0 %
Final Report Preparation	0 %

Problems and Solutions

- Due to the episodic heavy rains in the Metro East area during July, completion of the Cell berms was delayed by two weeks, thus extending the Containment Cell Construction schedule by two weeks. The Cell is not expected to be ready to begin receiving sediments prior to the late September – early October period.

Submittal Schedule Status

- See attached UAO schedule

Issues under review

- The Groundwater Monitoring Plan has been reviewed by the Agencies and Solutia is preparing a revised plan for submittal August 3, 2001.

Comments

- None

May 31 Sauget Area I UAO Sediment Removal Action

SCHEDULE

Deliverable	Description	Due Date
Issuance Date	Date UAO signed by Muno	31-May-00
Effective Date	10 business day after issuance	14-Jun-00
Notice of Intent to Comply	3 business days after effective date	19-Jun-00
Designation of Contractor and Project Coordinator	5 business days after effective date	21-Jun-00
Access	14 calendar days after effective date	28-Jun-00
Time Critical Removal Action Work Plan Submittal	15 business days after effective date	7-Jul-00
EPA Approval of TCRA W/P		May 10, 2001
Monthly Reports	Begin 30 calendar days after approval of TCRA W/P until completion	June 10, 2001
Final Report	60 Calendar days after completion of sediments and soils removal	
Mitigation Plan	60 Calendar days after completion of sediments and soils removal	